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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Bridging the Digital Divide for Low-Income Consumers, WC Docket No. 17-287;
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197

Notice of Oral and In-Person Ex Parte Communications

Dear Ms. Dortch:

On February 13, 2019, TracFone Wireless, Inc. representatives met in person and by phone with members of the Commission's Staff. The Staff attendees were:

- Trent Harkrader - Deputy Bureau Chief, Office of the Bureau Chief, Wireline Competition Bureau (in person)
- Allison Baker - Economic Advisor, Office of the Bureau Chief, Wireline Competition Bureau (in person)
- Ryan Palmer - Division Chief, Telecommunications Access Policy Division, Wireline Competition Bureau (by phone)
- Jodie Griffin - Deputy Division Chief, Telecommunications Access Policy Division, Wireline Competition Bureau (in person)

The TracFone attendees that met with Staff included the following:

- Mark Rubin - Senior Executive for Government Affairs (in person)
- David Avila - AVP, Lifeline Services, TracFone (by phone)
- Gina Jasman - Senior Director, Lifeline Services, Lifeline Support (by phone)
- Geoff Why - Verrill Dana, LLP, counsel for TracFone (in person)

The discussions concerned the Lifeline Program and the National Verifier. More specifically, TracFone explained that in states where Universal Service Administration Company (“USAC”) launched the National Verifier with access to databases from Supplemental Nutrition Assistance Program (“SNAP”), Medicaid, and Department of Housing and Urban Development (“HUD”), TracFone experienced better Lifeline approval results. Consequently, TracFone emphasized that the Commission and USAC should prioritize launching the National Verifier in states where those databases exist. For example, the National Verifier approved approximately 70% of TracFone’s new Lifeline applicants in New Mexico, where USAC has hard launched the National Verifier and where the National Verifier has access to SNAP, Medicaid, and HUD databases. In contrast, National Verifier approved only approximately 50% of new applicants in Mississippi, where the National Verifier has been hard launched and where the National Verifier has had only access to SNAP and HUD databases. TracFone also shared that when USAC used a manual process to access databases, Lifeline approvals were very low.

Staff and TracFone also discussed the continued use of SNAP and Medicaid cards as proof of Lifeline eligibility. Staff and TracFone explored ways in which there could be additional readily-available information that low-income users could use to show proof of current enrollment in SNAP or Medicaid.

Staff and TracFone acknowledged that Application Program Interfaces (“APIs”) are critical to the success of the National Verifier. TracFone shared that it has encountered issues in which consumer addresses that consumers initially submit to the National Verifier sometimes do not exactly match the address that the consumer submits to the carrier when requesting service. This results in the failure to receive Lifeline service. However, these mistakes are usually technical errors like a misspelled street name.

Finally, TracFone currently believes that the Lifeline program is a viable marketplace for carriers such as TracFone. However, with the upcoming 2019 minimum service standards changing in December 2019, TracFone and the other Lifeline providers are concerned that the economic model may not continue to successfully support Lifeline and the Commission’s Universal Service objectives.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is filed in ECFS. Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Geoffrey G. Why
Geoffrey G. Why

CC:

- Trent Harkrader - Deputy Bureau Chief, Office of the Bureau Chief, Wireline Competition Bureau

- Allison Baker - Economic Advisor, Office of the Bureau Chief , Wireline Competition Bureau
- Ryan Palmer - Division Chief, Telecommunications Access Policy Division, Wireline Competition Bureau
- Jodie Griffin - Deputy Division Chief, Telecommunications Access Policy Division, Wireline Competition Bureau